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October 22, 2013

BY ECF

The Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Daniel Bonventre et al,*  
Criminal Docket No. 10-228 (LTS)

Dear Judge Swain:

On behalf of all defendants, I write concerning the defendants' joint proposed jury instructions. Pursuant to the Court's revised schedule, the defense provided the Court with a hard copy of our request to charge on Monday, October 7, along with a version that tracked changes between our request and the Government's. We had provided both documents to the Government on October 4. However, upon submitting the hard copies to the Court, I did not file the request to charge on the ECF docket. I will do so shortly, but request that the docket reflect that hard copies were timely submitted. Further, Document No. 491, which was filed electronically on October 11 and which addresses the false books and records counts, supplements and supersedes Requests 17-24 in the version I will be filing shortly. Thank you for your consideration.

Respectfully submitted,



Jeremy B. Sporn

Cc: All counsel